

1 RICHARD H. RAHM, Bar No. 130728
rrahm@littler.com
2 ROD M. FLIEGEL, Bar No. 168289
rfliegel@littler.com
3 AMY S. MORGENSTERN, Bar No. 267412
amorgenstern@littler.com
4 LITTLER MENDELSON
A Professional Corporation
5 650 California Street, 20th Floor
San Francisco, CA 94108.2693
6 Telephone: 415.433.1940

7 Attorneys for Defendant
CPC LOGISTICS, INC.

8
9 HOFFMAN EMPLOYMENT LAWYERS LLP
MICHAEL HOFFMAN, Bar No. 154481
mhoffman@employment-lawyers.com
10 ALEC SEGARICH, Bar No. 260189
asegarich@sfemployment-lawyers.com
11 100 Pine Street, Suite 1550
San Francisco, CA 94111
12 Telephone: 415.362.1111

13 Attorneys for Plaintiff
14 NAZAL SADIQ

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 NAZAL SADIQ, individually, and on
19 behalf of all persons similarly situated,

20 Plaintiff,

21 v.

22 CPC LOGISTICS, INC., and DOES
23 1through 10, inclusive,

24 Defendant.

Case No. CV 10-02356 EDL

**STIPULATION TO EXTEND EARLY
NEUTRAL EVALUATION DEADLINE
AND [PROPOSED] ORDER**

Ctrm., Fl.: E, 15th

Judge: Hon. Elizabeth D. Laporte

Compl. Filed: April 30, 2010

Pursuant to Northern District A.D.R. Local Rule 5-5, Plaintiff NAZAL SADIQ (“Plaintiff”) and Defendant CPC LOGISTICS, INC. (“Defendant”) (collectively, “the Parties”), hereby stipulate to request an extended deadline to complete Early Neutral Evaluation of the instant case. This stipulation is based on the following:

1. REASONS FOR THE PROPOSED EXTENSION

- a. The Parties are currently bound to a November 18, 2010 deadline to complete Early Neutral Evaluation.
- b. The Parties have engaged in informal information exchange in an attempt to focus the issues of the case. As a result of this exchange, Plaintiff now intends to amend the operative complaint to comport with the Parties’ findings.
- c. George Harris, the Evaluator selected for the case, will be out of the country for several weeks just preceding the Parties’ deadline, such that the Evaluation session will currently need to be held in late October as a practical matter.
- d. Because the case is still at the pleading stage, and it is unlikely the Parties will be able to complete sufficient investigation of the case such that a meaningful evaluation can take place before the current deadline, they seek this extension.

2. THE PARTIES CONCUR ON THE PROPOSAL

- a. At the initial conference call with the Evaluator on September 8, 2010, the Parties agreed that extending the Evaluation deadline would lead to a more meaningful Evaluation session. The Evaluator agreed that this extension would be beneficial.

3. THE PROPOSED EXTENSION

- a. The Parties seek to extend the Early Neutral Evaluation deadline sixty (60) days, to January 17, 2011.

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1 **IT IS SO STIPULATED.**

2 Dated: September 10, 2010

HOFFMAN EMPLOYMENT LAWYERS LLP

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5 MICHAEL HOFFMAN
Attorneys for Plaintiffs
6 NAZAL SADIQ, ET AL.

7 Dated: September 10, 2010

LITTLER MENDELSON, P.C.

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10 RICHARD H. RAHM
Attorneys for Defendant
11 CPC LOGISTICS, INC.

(by Plaintiff's counsel with
authorization)

12
13 **[PROPOSED] ORDER**

14 The Stipulation of the Parties is hereby adopted by the Court as setting the parties' Early
15 Neutral Evaluation deadline as January 17, 2011.

16 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED.**

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19 DATED: 9/15/10

